

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION**  
Case No. 1:23-md-03076-KMM

**IN RE:**

**FTX Cryptocurrency Exchange Collapse  
Litigation**

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THIS DOCUMENT RELATES TO:

FTX Insider Defendants

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**JOINT MOTION FOR COURT APPROVAL  
OF CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiffs and Defendant Caroline Ellison (collectively, the “Parties”), jointly move the Court for entry of an order approving the Parties’ Joint Confidentiality and Protective Order and state:

1. The Parties agree and stipulate to entry of a protective order to cover the exchange of sensitive information in this case.
2. The Parties jointly move the Court for entry of an Order approving the Parties’ Joint Confidentiality and Protective Order.
3. This motion is filed by the Parties in good faith and not for purposes of delay. No party to this action will be prejudiced if this Court grants the relief sought herein.
4. Any other defendant to this litigation may execute an acknowledgement of confidentiality and agree to be bound by the Confidentiality and Protective Order.
5. Pursuant to Local Rule 7.1(a)(2), a proposed Order is attached for the Court’s convenience and a copy will be transmitted in Microsoft Word format via electronic of the Southern District of Florida.

WHEREFORE, the Parties jointly request that the Court issue an order approving the Parties' Joint Confidentiality and Protective Order (attached hereto as Exhibit A) and grant any other such relief as may be just and proper.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for the respective Parties represent that the Parties are in agreement with respect to the relief requested herein.

Dated February 9, 2024

By: /s/ Adam Moskowitz

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed on February 9, 2024 via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam Moskowitz  
Adam Moskowitz